

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,)	CASE NO. 1:20-cr-358
)	
Plaintiff,)	JUDGE SARA LIOI
-vs-)	
)	
ROBERT D. McWILLIAMS,)	<u>MOTION FOR CONTINUANCE</u>
)	<u>OF ALL DATES</u>
Defendant)	(Ends of Justice 18 U.S.C. §3161(h)(7))

Now comes the defendant herein, by and through the undersigned counsel and hereby moves this Honorable Court for a continuance of all dates, including the trial date, beyond the time limits set forth in 18 U.S.C. §3161(c)(1). The defendant makes this request pursuant to 18 U.S.C. §3161(h)(7) as necessary to insure the ends of justice. In support of this request, the defendant by and through the undersigned counsel, offers the following:

1. That due to the anticipated amount of discovery provided herein, together with the need for effective representation, counsel needs sufficient time to investigate, research and prepare. The parameters of speedy trial will not afford sufficient time to complete all tasks necessary to render effective assistance of counsel as guaranteed by the United States Constitution and mandated by counsel's oath. This is particularly true during the current Covid-19 pandemic. Visitation, and thus normal communication with the client has been difficult, if not impossible, at times. Therefore, normal case preparation is unfortunately delayed and additional time is needed beyond the limits for speedy trial in order to secure these ends of justice.
2. The undersigned counsel has discussed this motion with attorneys for the government and it is believed that this motion will be unopposed.

A court may continue a trial beyond statutory speedy trial limits where the ends of justice would be served. See United States v. Greenup, 401 F.3d 758 (6th Cir. 2005). The defendant respectfully suggests that a continuance of the present trial date will promote the ends of justice in that it will allow the defendant to make an informed decision herein.

WHEREFORE, based upon the foregoing, a reasonable continuance is requested and speedy trial rights are hereby waived.

Respectfully submitted,

/s/ Robert A. Dixon
ROBERT A. DIXON (#0022466)
4403 St. Clair Avenue
Cleveland, Ohio 44103
(216) 432-1992
(216) 881-3928 facsimile
Dixonlaws@aol.com

CERTIFICATE OF SERVICE

This document was filed via the ECF system for the U.S. District Court for the Northern District of Ohio and served upon all parties by operation of that system, this 21st day of July, 2020

/s/ Robert A. Dixon
ROBERT A. DIXON
Attorney for Defendant